Manville Service Corporation Ken-Caryl Ranch Denver, Colorado 80217 303 978-2000 Manville 137826

January 9, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Brad Bradley Remedial Project Manager U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Bradley:

Enclosed please find two copies of the latest report describing Manville's progress on the referenced project.

With best regards.

Yours very truly,

Marvin Clumpus, P.E. Project Coordinator

cc: Basil G. Constantelos, USEPA



PROGRESS REPORT

Date: January 9, 1987

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

- A. Preparation of responses to USEPA comments on Feasibility Study ("FS") report.
- B. Preparation and submittal of revisions to FS Report.
- C. Meetings with USEPA and IEPA representatives concerning FS Report and subsequent revisions.

III. WORK SCHEDULED

- A. Submit FS Report for public notice and comment.
- B. Initiate preliminary design work for remedial action alternatives.

Marving Clumpus, P.E. Project Coordinator

Manville Service Corporation Ken-Caryl Ranch

Denver, Colorado 80217 303 978-2000

Manville



December 9, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Brad Bradley Remedial Project Manager U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, IL 60604

JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Bradley:

Enclosed please find two copies of the latest report describing Manville's progress on the referenced project.

With best regards.

Yours very truly,

Marvin Clumpus, P.E.

Project Coordinator

cc: Basil G. Constantelos, USEPA

PROGRESS REPORT

Date: December 9, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

- A. Preparation of responses to USEPA comments on Feasibility Study ("FS") Report.
- B. Preparation and submittal of revisions to FS Report.
- C. Meetings with USEPA and IEPA representatives concerning FS Report and subsequent revisions.

III. WORK SCHEDULED

- A. Continue discussions with USEPA and IEPA on proposed "Recommended Remedial Action Alternative".
- B. Submit FS Report for public notice and comment.
- C. Initiate preliminary design work for remedial action alternatives.

IV. REMARKS

A. In light of the continuing communications between Manville and USEPA since July concerning the FS Report, it was believed that monthly progress reports would be redundant and were not necessary. Pursuant to USEPA request, Manville will renew submittal of monthly progress reports until no longer required by mutual agreement or the terms of the Consent Order.

Marvin Clumpus, P.E. Project Coordinator **Manville Sales Corporation** Post Office Box 5108 Denver, Colorado 80217-5108 303 978-2000

Manville

July 8, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Brad Bradley Remedial Project Manager U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Bradley:

Enclosed please find two copies of the twenty-second describing Progress Report Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Narvin Clumpus Project Coordinator

MC/jb

Enclosures

cc: Basil G. Constantelos, USEPA

Date: <u>July 8, 1986</u>

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. **GENERAL**

- Per Article V.B. of the Consent Order, this twenty-second monthly progress report is hereby submitted.
- Manville acknowledges receipt of comments from USEPA on the Feasibility Study ("FS") Report submitted to USEPA in February 1986.

WORK UNDERTAKEN/COMPLETED II.

Review of USEPA comments on FS Report initiated by Manville and its consultant. (See Remarks, below.)

III. WORK SCHEDULED

Prepare response to USEPA comments and addendum to FS Report. (See Remarks, below.)

IV. REMARKS

- As explained in the June 23, 1986 letter to Mr. Brad Bradley, Manville cannot properly respond to all of USEPA's comments or supplement the FS Report until additional information is received from the Agency. As soon as possible after receiving and reviewing such information, Manville would like to meet with the Agency.
- Manville understands that Mr. Rodney Gaither has been assigned new responsibilities and that Mr. Brad Bradley now is the Agency's designated Project Coordinator for this site. Unless otherwise advised, Manville will direct all future communications with USEPA to Mr. Bradley accordance with Article VIII of the Consent Order.

Project Coordinator

Manville Sales Corporation Post Office Box 5108 Denver, Colorado 80217-5108 303 978-2000

Manville

June 9, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Rodney Gaither Project Coordinator U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the twenty-first Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

nMarvin Clumpus Project Coordinator

MC/jb

Enclosures

Basil G. Constantelos, USEPA cc:

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Date: June 9, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this twenty-first monthly progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

A. No new activity to report.

III. WORK SCHEDULED

A. No new activity to report.

Marvin Clumpus

Project Coordinator

Manville Service CorporationPost Office Box 5108
Denver, Colorado 80217
303 978-2000

Manville

May 9, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the twentieth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/jb

Enclosures

cc: Basil G. Constantelos, USEPA



Date: May 9, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this twentieth monthly progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

A. No new activity to report.

III. WORK SCHEDULED

A. No new activity to report.

Marvin Clumpus

Project Coordinator

Manville Sales Corporation Post Office Box 5108 Denver, Colorado 80217-5108 303 978-2000



Manville

April 4, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the nineteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/jb

Enclosures

cc: Basil G. Constantelos, USEPA

Date: April 4, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

GENERAL I.

A. Per Article V.B. of the Consent Order, this nineteenth monthly progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

A. No new activity to report.

III. WORK SCHEDULED

A. No new activity to report.

Maryin Clumpus Project Coordinator

Manville Service Corporation Ken-Caryl Ranch P.O. Box 5108 Denver, Colorado 80217 303 978-2000 **Manville**

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March 5, 1986

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the eighteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards,

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/jb

Enclosures

cc: Basil G. Constantelos, USEPA

Date: March 5, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this eighteenth monthly progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

A. Feasibility Study ("FS") Report submitted to USEPA.

III. WORK SCHEDULED

A. None, pending USEPA review and approval of FS Report.

Marvin Clumpus

Project Coordinator

P.E.

Manville Service Corporation Ken-Caryl Ranch P.O. Box 5108 Denver, Colorado 80217 303 978-2000

Manville

January 9, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the seventeenth Progress Report describing Johns-Manville's compliance efforts.

With best regards,

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/jb

Enclosures

cc: Basil G. Constantelos, USEPA

U.S. EPA, KÉBÜK Y WASIE MANAGEMENT OPVISION HAZARDOUS WASIE ENTOROLMENT GRAAF

MEGENVED

Date: January 9, 1986

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. GENERAL

A. Per Article V.B. of the Consent Order, this seventeenth monthly progress report is hereby submitted.

II. WORK UNDERTAKEN/COMPLETED

- A. Continued analysis of FS alternatives.
- B. Begin preparation of FS report.

III. WORK SCHEDULED

A. Preparation of FS report (to be submitted to USEPA on or before February 7, 1986).

Marvin Clumpus

Project Coordinator

Manville Service Corporation Ken-Caryl Ranch Denver, Colorado 80217 303 978-2000 **Manville**

December 10, 1985

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the sixteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

Enclosures

cc: Basil G. Constantelos, USEPA



Date: December 10, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. General

A. Per Article V.B. of the Consent Order, this sixteenth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

A. Analysis of Feasibility Study alternatives.

III. Work Scheduled

A. Begin preparation of Feasibility Study report.

IV. Remarks

A. Johns-Manville confirms a meeting with USEPA on December 13, 1985 to review the Feasibility Study process in detail.

Marvin Clumpus
Project Coordinator

Manville Service Corporation Ken-Caryl Ranch Denver, Colorado 80217 303 978-2000

Manville



November 7, 1985

WASTE MANAGEMENT OFFICER RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the fifteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/ekp

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

Date: November 7, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. General

A. Per Article V.B. of the Consent Order, this fifteenth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Compilation of documents in response to comments of USEPA.
- B. Preliminary analysis of Feasibility Study alternatives.

III. Work Scheduled

A. Continued analysis of Feasibility Study alternatives.

IV. Remarks

- A. Johns-Manville is pleased to acknowledge receipt of USEPA's approval of the Final Remedial Investigation Report, with all modifications.
- B. Johns-Manville agrees that a meeting with USEPA to review the Feasibility Study process in detail would be useful and looks forward to such a meeting in the near future.

Marvin Clumpus,

Project Coordinator

Manville Corporation Ken-Caryl Ranch Post Office Box 5723 Denver, Colorado 80217 303 978-2000

Manville

October 9, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: JOHNS-MANVILLE WAUKEGAN DISPOSAL AREA RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the fourteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC:ir

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File



bcc: S. V. Moser, 2-16
J. H. Whipple, 3-25
D. R. Burford, 1-06
J. E. Crawford, 2-09
R. Jonas, WBP
R. Gomez, 1-01
J. H. Scott, WBP

Date: October 9, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

I. General

A. Per Article V.B. of the Consent Order, this fourteenth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

A. Technical memorandum # M-2 concerning ambient air study for lead and analysis of common inorganic anions in water submitted to USEPA.

III. Work Scheduled

- A. Preparation of addendum to final RI Report responding to comments of USEPA made at September 4, 1985 meeting.
- B. Preliminary development and evaluation of alternatives to be addressed in Feasibility Study Report.

Marvin Clumpus,

Project Coordinator

Manville Service Corporation Ken-Caryl Flanch P.O. Box 5108 Denver, Colorado 80217 303 978-2000

Manville

September 6, 1985

Certified Mail, Return Receipt Requested

Mr. Rodney Gaither Project Coordinator U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the thirteenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly

Marvin Clumpus

Project Coordinator

MC/cd

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

RECEIVED

U.S. EPA. REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

¥,

Date: September 6, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this thirteenth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Field work for ambient air study (lead) completed.
- B. Laboratory results and preliminary analyses of ambient air samples (lead) and groundwater samples requested by USEPA prepared and submitted to USEPA at September 4, 1985 meeting.

III. Work Scheduled

- A. Preparation of technical memorandum on ambient air study for lead and additional groundwater analysis requested by USEPA. (To be submitted on or before September 15, 1985.)
- B. Preparation of addendum to final RI Report responding to comments of USEPA made at September 4, 1985 meeting.
- C. Preliminary development and evaluation of alternatives to be addressed in Feasibility Study Report.

IV. Remarks

- A. Johns-Manville acknowledges receipt of letter of August 5, 1985 from Mr. Gaither, disapproving the Final RI Report pending resolution of certain matters. Johns-Manville is disappointed, but remains confident that all matters concerning the RI Report can be resolved quickly to the mutual satisfaction of the parties.
- E. As stated previously, Johns-Manville is anxious to proceed with the FS phase and suggests a meeting with USEPA as soon as practicable after approval of the RI Report.

Marvin Clumpus,

Project Coordinator

Manville Service Corporation Ken-Caryl Ranch POB 5723 Denver, Colorado 80217 303 978-2000

Manville

August 8, 1985

Certified Mail, Return Receipt Requested

Mr. Rodney Gaither Project Coordinator U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the twelfth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/pw

Enclosures

Basil G. Constantelos, USEPA

Chrono/File

MASTE MANAGEMENT DIVISION WANTE DANGLE RENT 1994

Date: August 8, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this twelfth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Field work for ambient air study (lead) commenced during week of July 29, 1985.
- B. Groundwater samples collected for additional analysis requested by USEPA.

III. Work Scheduled

- A. Completion of field work for ambient air study (lead) (expected completion date: August 9, 1985).
- B. Initiation of analysis of air and groundwater samples.
- C. Preliminary work on Feasibility Study phase.

Marvin Clumpus,

Project Coordinator

Manville Service Corporation Ken-Caryl Ranch POB 5723 Denver, Colorado 80217 303 978-2000

Manville

July 8, 1985



Certified Mail, Return Receipt Requested

Mr. Rodney Gaither
Project Coordinator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the eleventh Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Stephen V. Moser

Alternate Project Coordinator

SVM/pw

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

Date: July 8, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

- A. Per Article V.B. of the Consent Order, this eleventh monthly progress report is hereby submitted.
- B. Johns-Manville acknowledges receipt from USEPA of comments on the draft Remedial Investigation ("RI") Report submitted to USEPA in March, 1985.

II. Work Undertaken/Completed

- A. Review of USEPA comments on draft RI Report initiated by Johns-Manville and its technical consultants; responses to comments prepared and sent to USEPA on July 3, 1985.
- B. Final RI Report, incorporating USEPA comments as appropriate, completed and submitted to USEPA for review and approval. (Five copies sent on July 3, 1985.)
- C. Proposals for ambient air study of lead and for additional groundwater analysis prepared and submitted to USEPA.

III. Work Scheduled

- A. Initiation of field work for ambient air study (lead) and for additional groundwater analysis (late July or early August, 1985).
- B. Preliminary work on Feasibility Study ("FS") phase.

IV. Remarks

- A. Dr. S. K. Malhotra, technical consultant to Johns-Manville, revised his travel plans and has now advised Johns-Manville that he will be out of the country and unavailable for consultation until late July or early August, 1985.
- B. Johns-Manville looks forward to USEPA's review and approval of the final RI Report in accordance with Section V.C. of the Consent Order. Johns-Manville is anxious to proceed with the FS phase and to develop an acceptable Remedial Action Alternative for the site.

Stephen V. Moser, Alternate Project Coordinator Manville Service Corporation
Ken-Caryl Ranch POB 5723
Denver, Colorado 80217
303 978-2000



Manville

JHM 1 1-1985

U.S. EPA, RECIBER &
WASTE WANDSMENT INVISION
HAZARRIBUS WASTE BURNELIERS MANY!

June 6, 1985

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S.Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the tenth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/pw

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

Date: June 6, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this tenth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Review of analysis of asbestos in water samples using electron microscopy completed.
- B. Technical memorandum re same prepared (copy sent to Mr. Gaither on June 6, 1985).

III. Work Scheduled

A. Incorporate results of analysis of asbestos in water in final RI Report.

IV. Remarks

A. Johns-Manville has been advised that Dr. S. K. Malhotra, its technical consultant on this project, will be out of the country and unavailable for consultation for a three-week period beginning June 22, 1985.

Marvin Clumpus,

Project Coordinator

Manville Service Corporation Ken-Caryl Ranch Denver, Colorado 80217 303 978-2000

Manville

May 7, 1985

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the ninth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/pw

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

bcc: S. V. Moser (2-16)
J. H. Whipple (3-25)
D. R. Burford (1-06)
J. E. Crawford (2-09)
M. Debish (WBP)
C. A. Bowers (1-01)
J. H. Scott (WBP)

Date: May 7, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this ninth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Preliminary review of analysis of asbestos in water using electron microscopy initiated (reference draft RI Report, page 4-24).
- B. Additional water samples collected (to be analyzed for asbestos using electron microscopy).

III. Work Scheduled

- A. Complete review of analysis of asbestos in water.
- B. Incorporate III.A. above in final RI Report to be submitted to USEPA.

IV. Remarks

A. Johns-Manville, through its consultant KMA, notified USEPA of its intent to collect additional water samples. USEPA declined to be present or represented at the Johns-Manville property during the sample collection activity.

Marvin Clumpus,

Project Coordinator

Manville Corporation Ken-Caryl Ranch POB 5723 Denver, Colorado 80217 303 978-2000 **Manville**



April 8, 1985

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the eighth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Yours very truly,

Marvin Clumpus

Project Coordinator

MC/pk

Enclosures

cc: Basil G. Constantelos, USEPA

Chrono/File

Date: April 8, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this eighth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

A. No new activity to report.

III. Work Scheduled

A. No new activity to report.

IV. Remarks

A. I have assumed the responsibilities as Project Coordinator for Mr. K. Nerheim, who recently retired. Therefore, all major communications concerning the implementation of the Consent Order should be directed to me as follows:

Marvin Clumpus
Manville Service Corporation
P.O. Box 5108
Denver, Colorado 80217
(303)978-2790

Marvin Clumpus, Project Coordinator **Manville Corporation** Ken-Caryl Ranch Denver, Colorado 80217 303 978-2000

Manville

March 8, 1985



CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find two copies of the seventh Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Very truly yours,

K. (Chet) Nerheim

Manager, Assets Recovery and Project Coordinator

cc: Basil G. Constantelos, USEPA

Chrono/File

Date: March 8, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this seventh monthly progress report is hereby submitted.

II. Work Undertaken/Completed

A. Draft Remedial Investigation ("RI") Report completed and submitted to USEPA on March 4, 1985.

III. Work Scheduled

A. Preparation of final RI Report incorporating preliminary comments of USEPA (to be submitted approximately two weeks after receipt of Agency comments by Johns-Manville).

K. (Chet) Nerheim, Project Coordinator **Manville Corporation** Ken-Caryl Ranch Denver. Colorado 80217 303 978-2000

Manville

February 7, 1985

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

Enclosed please find the sixth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Very truly yours,

Stephen V. Moser

Attorney and Alternate Project Coordinator

cc: Basil G. Constantelos, USEPA

Date: February 7, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this sixth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Technical report on air monitoring study completed (to be incorporated in Remedial Investigation ["RI"] Report).
- B. Preparation of draft RI Report initiated. (See Remarks, below.)

III. Work Scheduled

A. Completion and submittal to USEPA of draft RI Report (expected March 4, 1985).

IV. Remarks

- A. At the January 11, 1985 meeting, Johns-Manville and USEPA reviewed preliminary results of the remedial investigation and discussed the required scope and format of the RI Report. Further, Johns-Manville requested an extension of time for submittal of the RI Report. Johns-Manville understood that USEPA would agree to an extension, providing that Johns-Manville submit a draft RI Report on or before March 4, 1985.
- B. By letter dated January 18, 1985, Johns-Manville formally requested an extension of time for submittal of the RI Report. Johns-Manville has not received a formal response from USEPA to date, but is proceeding on the assumption that its request has been or will be approved.

Stepken V. Moser,

Alternate Project Coordinator

Manville Corporation Ken-Caryl Ranch POB 5108 Denver, Colorado 80217 303 978-2000

Manville

January 21, 1985

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Rodney Gaither
Project Coordinator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Gaither:

This letter is to confirm for the record that Johns-Manville hand delivered four copies of its monthly Progress Report to USEPA at our recent meeting in Waukegan.

This letter also is to confirm that you are now the Project Coordinator for USEPA and that all communications with USEPA concerning this project should be directed to you and not to Mr. Mains.

We look forward to working with you and maintaining the good relationships established with the Agency during Mr. Mains' tenure as Project Coordinator.

Very truly yours,

Stychen V. Moser

fock. (Chet) Nerheim

Manager, Assets Recovery and Project Coordinator

cc: Basil G. Constantelos, USEPA

RECEIVED
JAN 2 5 1985

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

ú

JMI Johns-Manville

Sales Corporation

Waukegan, Illinois 60087 (312) 623-2900

January 10, 1985

"Both Johns-Manville Sales Corporation and Johns-Manville Corporation are subsidiaries of Manville Corporation"

William D. Mains **Project Coordinator** U. S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Il 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Mains:

Enclosed please find the fifth Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Very truly yours,

K. (Chet) Nerheim Manager, Assets Recovery

and Project Coordinator

Basil G. Constantelos, USEPA Rodney Gaither, USEPA

Date: January 10, 1985

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this fifth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Laboratory analyses of soil and groundwater samples completed.
- B. Laboratory analyses of air samples substantially completed.
- C. Preliminary reports on soil/groundwater/air investigations prepared and submitted to USEPA

III. Work Scheduled

- A. Preparation of technical memoranda per Exhibit 2, subject to results of scheduled meeting with USEPA. (See Remarks, below.)
- B. Preparation of Remedial Investigation Report per Exhibit 3, subject to results of scheduled meeting with USEPA (See Remarks, below.)

IV. Remarks

- A. Johns-Manville and USEPA are scheduled to meeting on January 11, 1985 to review preliminary results of remedial investigation and to discuss guidelines and requirements for preparation and submittal of Remedial Investigation Report. Such a meeting was requested by Johns-Manville in its last monthly progress report.
- B. Johns-Manville understands that Mr. William Mains has been assigned new responsibilities within USEPA and will no longer serve as the Agency's designated Project Coordinator. Further, Johns-Manville understands that Mr. Rodney Gaither will be designated as USEPA's new Project Coordinator. Unless otherwise notified, Johns-Manville shall direct all future communications with USEPA to Mr. Gaither in accordance with Article VIII of the Consent Order.

K. (Chet) Nerheim,Project Coordinator

W. Neiheim

Manville Corporation
Ken-Caryl Ranch POB 57 23
Denver, Colorado 80217
303 978-2000

Manville

December 6, 1984

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William D. Mains
Project Coordinator
U. S. Environmental Protection
Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Mains:

Enclosed please find the fourth Progress Report describing Johns-Manville's compliance efforts. In particular, please note paragraph IV.B., suggesting a meeting to review our preliminary results and the preparation of the Remedial Investigation Report.

With best regards.

Very truly yours,

K. (Chet) Nerheim

Manager, Assets Recovery and Project Coordinator

KN/vfm Enclosure

cc: Basil G. Constantelos, USEPA

Rodney Gaither, USEPA

Date: December 6, 1984

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this fourth monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Field work for air monitoring study completed.
- B. Laboratory analyses of soil and groundwater samples substantially completed.
- C. Laboratory analyses of air samples substantially completed.
- D. Preliminary review and analyses of test results initiated.

III. Work Scheduled

- A. Continued review and analyses of test results.
- B. Preparation of draft technical memoranda per Exhibit 2.
- C. Begin preparation of Remedial Investigation Report.

IV. Remarks

- A. Johns-Manville acknowledges, and appreciates, USEPA approval of final Work Plan for Geotechnical and Hydrological Investigation, subject to conditions in undated letter from Mr. Mains, received on or about November 21, 1984.
- B. Johns-Manville suggests, and hereby requests, a meeting with USEPA to review preliminary results of remedial investigation and to obtain further guidance on preparation of Remedial Investigation Report.

K. (Chet) Nerheim, Project Coordinator Manville Corporation Ken-Caryl Ranch POB 5108 Denver, Colorado 80217 303 978-2000

Manville

November 5, 1984

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William D. Mains
Project Coordinator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Mains:

Enclosed please find the third Progress Report describing Johns-Manville's compliance efforts.

With best regards.

Very truly yours,

K. (Chet) Nerheim

Manager, Assets Rcovery and Project Coordinator

KN/

Enclosure

cc: Basil G. Constantelos, USEPA

Rodney Gaither, USEPA

Date: November 2, 1984

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this third monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Contract for air monitoring study let to Ontario Research Foundation.
- B. Field work for air monitoring study initiated, including:
 - Selection of five (5) on-site and three (3) off-site, background monitor locations (see Attachments 1 and 2)
 - 2. Performance of pre-test sampling per Exhibit 1.
 - 3. Analysis of pre-test samples.
 - 4. Commencement of actual air sampling per Exhibit 1.
- C. Laboratory analyses of air samples initiated.
- D. Final work plan for Geotechnical and Hydrological Investigation, including supplemented quality assurance project plan, submitted to U.S.E.P.A.
- E. Laboratory analyses of soil and water samples continued.

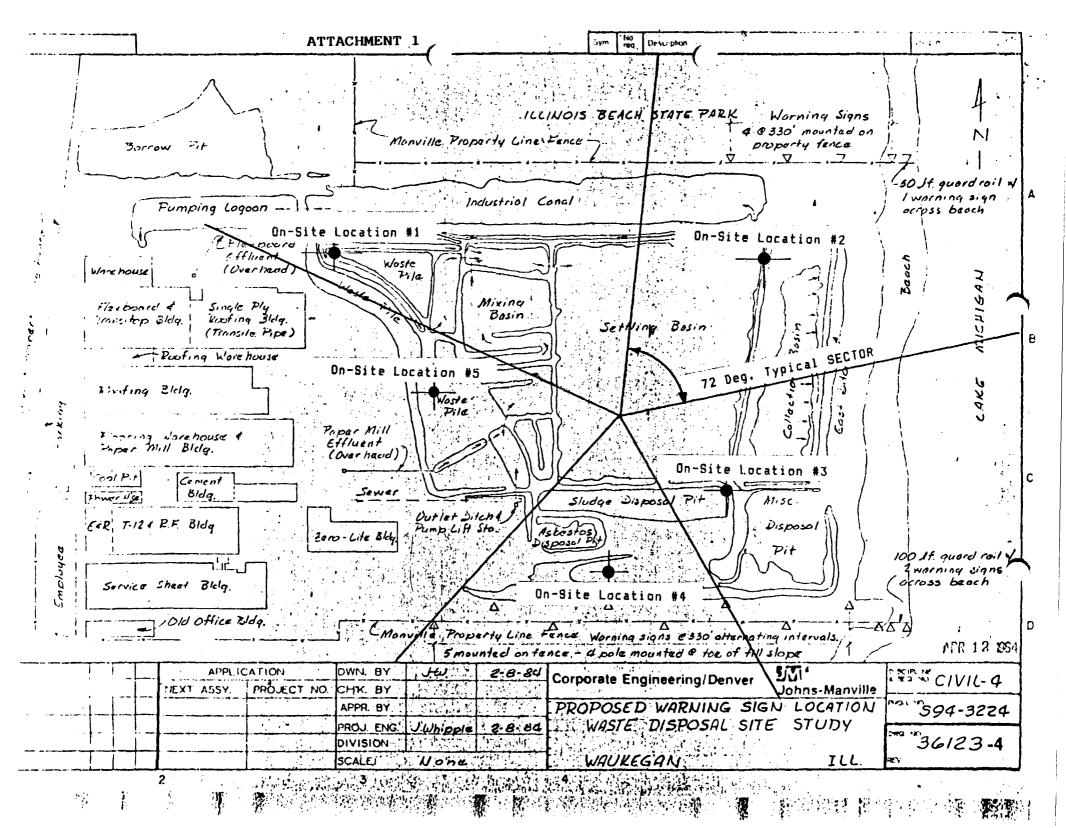
III. Work Scheduled

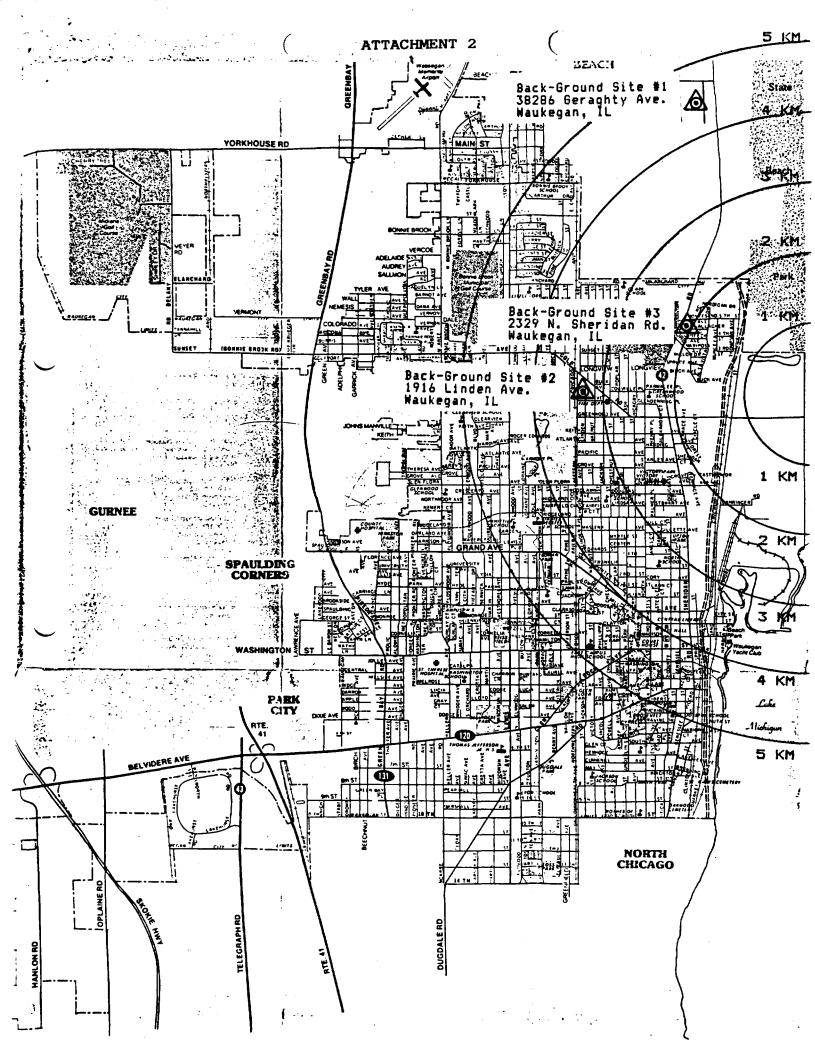
- A. Continued analyses of soil, water and air samples.
- B. Preliminary analyses of data.

IV. Remarks

- A. On-site and off-site background air monitor locations reviewed with USEPA prior to commencement of actual air sampling.
- B. No objections to or concerns about final work plan for Geotechnical & Hydrological Investigation have been communicated by USEPA. Johns-Manville is proceeding on the assumption that USEPA's previously identified concerns have been satisfied.

K. (Chet) Nerheim,Project Coordinator





Manville Corporation
Ken-Caryl Ranch POB 5723
Denver, Colorado 80217
303 978-2000

Manville

October 8, 1984

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

William D. Mains
Project Coordinator
U. S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Mains:

Thank you for your letter of September 21, 1984. In accordance with that letter and Articles V.B. and VIII. of the Consent Order, I am hereby submitting to you the second progress report describing Johns-Manville's compliance efforts.

Also, please accept my apologies for the apparent lack of response to the concerns noted in your September 21 letter. I had understood that our consultant, KMA Associates, had promptly notified you of its efforts to supplement and finalize the work plan and associated quality assurance plan. Clearly, our internal lines of communication need to be improved, and we are working on that.

With best regards.

Very truly yours,

K. (Chet) Nerheim
Manager, Assets Recovery
and Project Coordinator

KN/vfm Enclosure

cc: Basil G. Constantelos, USEPA Rodney Gaither, USEPA

Date: October 8, 1984

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

A. Per Article V.B. of the Consent Order, this second monthly progress report is hereby submitted.

II. Work Undertaken/Completed

- A. Field work for Geotechnical and Hydrological Investigation completed, including:
 - 1. Six disposal site soil borings completed and samples collected.
 - 2. Four non-disposal site soil borings completed and samples collected.
 - 3. Five groundwater monitoring wells installed and samples collected; Well No. 5 (parking lot-west) relocated to just outside blacktop surface with concurrence of U.S.E.P.A.
 - 4. Hydraulic conductivity tests conducted on five monitoring wells.
 - 5. Site location and elevation survey performed.
 - 6. Using personal air samplers, occupational exposure of field personnel to asbestos sampled throughout field work, including continuous sampling during drilling activities on disposal site; all sampling results well below permissible exposure limit (See Attachment A).
- B. Additional information requested by U.S.E.P.A. to supplement draft quality assurance project plan gathered under direction of consultant performing Geotechnical and Hydrological Investigation. (Requested information to be available and submitted to U.S.E.P.A. on or before October 15, 1984.)
- C. Bids for air monitoring study considered. (See Remarks.)

III. Work Scheduled

A. Contract for air monitoring study to be awarded and preliminary preparations for field work to begin.

- B. Final work plan for Geotechnical and Hydrological Investigation, including supplemented quality assurance project plan, to be submitted to U.S.E.P.A.
- C. Laboratory analyses of soil and water samples to begin (4-8 weeks estimated for completion of lab work).

IV. Remarks

- A. Dr. James P. Leineweber, Alternate Project Coordinator with primary responsibility for air monitoring study, is on leave indefinitely for health reasons. Reassignment of personnel and responsibilities is still being evaluated. While this has caused some delay in consideration and selection of bids for the air monitoring study, it is not expected to delay overall implementation of the Consent Order.
- B. U.S.E.P.A. will be notified prior to commencement of any field work related to the air monitoring study.
- C. Johns-Manville acknowledges receipt of letter dated September 21, 1984, from U.S.E.P.A. designating its Project Coordinator and Alternate Project Coordinator and acknowledging its receipt of Johns-Manville's Water Balance Study Report and Johns-Manville's installation of warning signs in accordance with the Consent Order.

K. (Chet) Nerheim, Project Coordinator



Internal Correspondence

To: L. Austin - Site Manager/ Safety Officer Date: September 20, 1984

From: C. M. Carter - Waukegan

Copies: D. R. Christensen 1-06

D. Burford 1-06

J. H. Scott - Waukegan

M. Debish - Waukegan

Subject: ASBESTOS MONITORING OF PROJECT TEAM WAUKEGAN WASTE DISPOSAL SITE

The geotechnical and hydrogeologic investigation of the Waukegan waste disposal site began on September 10, 1984. The borings and instalation of the test wells was completed on September 19th. Members of the project team were sampled to determine their occupational exposure to asbestos. The analytical method followed was P&CAM 239 from the NIOSH Manual of Analytical Methods. The federal permissible exposure limit (PEL) for airborne asbestos fiber is 2.0 fibers per cubic centimeter of air. All but one of the sample results were 0.1 F/cc or less. There was a single sample on one of the geologists with a result of 0.4 F/cc. The results of the samples are as follows:

SAMPLE DATE	STATION	RESULT F/cc	PEL F/cc
9/11/84	SPD-102YM Personal - Geologist	<0.1 <0.1 <0.1	2.0 2.0 2.0
	SPD-103YM Personal - Drilling Tech.	0.1 <0.1 <0.1	2.0 2.0 2.0

During the samples on 9/11/84 a soil boring was taken from the west end of the sludge disposal pit.

9/12/84	SPD-102YM Personal - Geologist	<0.1	2.0
		0.1	2.0
		<0.1	2.0
		<0.1	2.0
	SPD-103YM Personal - Drilling Tech.	<0.1	2.0
	_	0.1	2.0
		0.1	2.0
		N.D.	2.0
		<0.1	2.0

N.D. - No Asbestos Fiber Detected On Sample

On 9/12/84 operators took borings at two locations. Samples were taken while working in the east end of the sludge disposal site and in the active scrap disposal area.

Asbestos Sample Results Waukegan Waste Disposal Site Page 2

9/13/84	SPD-101YM	Area - Work Site	<0.1	2.0
	SPD-102YM	Personal - Geologist	<0.1	2.0
	SPD-103YM	Personal - Drilling Tech.	<0.1	2.0

Operators were monitored while boring at the south west corner of the settling basins.

9/14/84	SPD-102YM	Personal	- Geologist	0.4	2.0
	SPD-103YM	Personal	- Drilling Tech.	0.1	2.0

Operators were monitored while boring at the north end of the flexboard ditch. This was the last site in the active disposal area. The higher result on the geologist is due to the dryer conditions of the core samples being obtained and processed.

One work practice was noticed that contributed to this operators exposure. After several samples had been processed a brush was used to clean off the tailgate of the truck being used as a work surface. This caused visible airborne dust to be generated. The tailgate should be washed down with water when cleaning.

9/17/84	SPD-102YM	Personal	-	Geologist	<0.1	2.0
	SPD-103YM	Personal	_	Drilling Tech.	<0.1	2.0

These samples were taken while boring at the first site off of the active landfill. Based on these results and observed conditions at the off-site wells and boring locations, the mandatory use of respiratory protection need not be required.

9/18/84	SPD-101YM Area - Work Site	N.D.	2.0
	SPD-103YM Personal - Drilling Tech.	N.D.	2.0

These samples were taken while the crew drilled a test well on the northeast corner of the properity.

Manville Service Corporation
Ken-Caryl Ranch POB 5108
Denver, Colorado 80217
303 978-2000

Manville

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

September 7, 1984

Basil G. Constantelos Director, Waste Management Division U. S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, IL 60604

WASTE MANAGEMENT
BRANCH

Re: Johns-Manville Waukegan Disposal Area RI/FS

Dear Mr. Constantelos:

In accordance with Article XIII.A. of the Administrative Order by Consent (the "Consent Order") entered into between Johns-Manville Sales Corporation and the U. S. Environmental Protection Agency, I have forwarded to the USEPA, Region V, Regional Hearing Clerk on this date a check in the amount of \$43,735.00 payable to the order of the Hazardous Substances Response Trust Fund. For your files, I have enclosed a copy of the check and accompanying cover letter.

Further, in accordance with Article V.B. of the Consent Order, I am hereby submitting the first monthly progress report describing the efforts of Johns-Manville towards implementing the terms of the Consent Order. If you have any questions or comments concerning the form or content of the report, please let me know.

Very truly yours,

K. (Chet) Nerheim,

Manager, Assets Recovery and

Project Coordinator

KN/

Enclosures

Date: September 7, 1984

IMPLEMENTATION OF ADMINISTRATIVE ORDER BY CONSENT

JOHNS-MANVILLE SALES CORPORATION WAUKEGAN FACILITY DISPOSAL AREA

- A. On July 16, 1984, Johns-Manville petitioned the United States Bankruptcy Court for approval to enter into the Consent Order; on August 9, 1984, the Court entered such an order.
- B. Per Article V.B. of the Consent Order, this first monthly progress report is being submitted; subsequent progress reports will be submitted on or before the tenth day of each month until the Consent Order is fully implemented.

II. Work Undertaken/Completed

- A. Installation of warning signs per Article IV.A.1. of the Consent Order
- B. Completion of water balance study and report per Article IV.A.2. of the Consent Order
- C. Designation of Project Coordinator and Alternate Project Coordinators per Article VIII. of the Consent Order
- D. Preparation of draft Work Plan for Geotechnical and Hydrological Investigation
- E. Requests for bids to perform air monitoring study sent to candidate consultants
- F. Payment of response costs per Article XIII.A. of the Consent Order (payment sent via certified mail on September 7, 1984)

III. Work Scheduled

- A. Field work for Geotechnical and Hydrological Investigation to begin week of 9/9 (2-3 weeks estimated for completion)
- B. Bids for air monitoring study to be reviewed and consultant to be selected
- C. Submittal of final Work Plan for Geotechnical and Hydrological Investigation

IV. Remarks

- A. Draft Work Plan for Geotechnical and Hydrological Investigation reviewed with USEPA and IEPA on August 22, 1984; plan verbally approved, subject to minor revisions agreed to at meeting.
- B. Johns-Manville has not received USEPA's designation of its Project Coordinator per Article VIII. of the Consent Order and, until otherwise notified, will continue to direct all communications to Director, Waste Management Division, USEPA, Region V.
- C. On or about August 21, 1984, Johns-Manville requested USEPA's approval of certain work completed per Article V.C.1. of the Consent Order and is looking forward to such approval.

K. (Chet) Nerheim, Project Coordinator